

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

CRIMINAL NO.: 1:04-cr-10336-NMG

2005 SEP 30 P 2: 04

U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES OF AMERICA

v.

REYNALDO RIVERA

DEFENDANT, REYNALDO RIVERA'S MOTION
TO MODIFY CONDITIONS OF RELEASE

Now comes the Defendant, Reynaldo Rivera through his attorney and respectfully moves this Honorable Court to Modify his conditions of release so that he may maintain gainful employment.

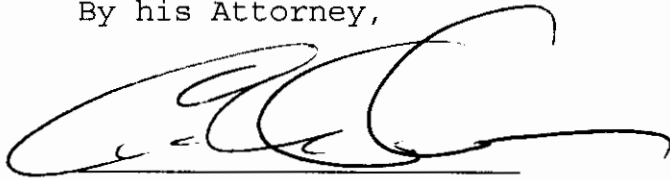
The Defendant respectfully prays that this Honorable Court modify his conditions of release by removing the electronic monitoring and replace the terms and conditions to daily telephone contact with pre-trial services.

The Defendant has been completely compliant with each and every condition placed upon him to date. The Defendant states that with the removal of the electronic monitoring device, he will successfully be able to gain employment and participate more in an active role for his family (two small children-one child, three months old). Moreover, the Defendant will be able to contribute to the rising costs of

his mother and father supporting his wife, and two sons in his parents' home.

All of the other conditions are to remain the same. As grounds therefore, the Defendant respectfully requests that his motion be allowed.

Respectfully Submitted
Reynaldo Rivera
By his Attorney,

A handwritten signature in black ink, appearing to be 'Carl N. Donaldson', written over a horizontal line.

Carl N. Donaldson (BBO#645384)
CARL DONALDSON & ASSOCIATES
11 Beacon Street, Suite 600,
Boston, MA 02108

Dated: September 23, 2005

617-742-0474

CERTIFICATE OF SERVICE

I, Carl Donaldson hereby certify that on this 23rd day of June, 2005, I have served the Defendant's Motion To File Motion Late by Hand Delivery to the following counsel of record:

Assistant United States Attorney,
William F. Bloomer
One Courthouse Way, 9th Floor
Boston, MA

Dated: September 30, 2005

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

Carl N. Donaldson